

United States District Court, for the Southern District of Illinois

William Mabie
V. PLAINTIFF

T.B.A.

18-2218-JPG

Unknown Medical Staff of Marion #N1
United States Penitentiary
DEFENDANT

PETITION FOR IMMEDIATE INJUNCTIVE RELIEF MEDICAL NECESSITY

Comes now plaintiff acting PRO SE requesting immediate injunction against U.S.P. Marion Medical Staff which routinely withholds prescription medication, causing permanent visual impairment, and alters diet, as retribution by Staff

I WITHHELD: BRIMONIDINE TARTRATE, TYLENOL, FOOD.

Brimonidine is prescribed to treat glaucoma. Sudden withdrawal causes intraocular pressure to spike, damaging vision (tunnel vision - to full blindness) and is not reversible.

Because of earlier eye surgery in which lens was removed, plaintiff's vision does not align (double vision). This leads to headaches for which Tylenol was prescribed, rather than correct vision with implant.

Each time Correction Officer searches cell these are disposed of, even though clearly marked as to what is contained.

Rather than replace immediately staff practise is to claim "pharmacist is off duty" or other garbage excuse.

This has occurred 4 times since 6/15/18, each time delaying up to 5 days - Wednesday AM til Monday PM.

BUT, DAMAGE BEGINS AT 24 HOURS,
AND STAFF KNOWS THIS.

This is deliberate infliction of permanent disability.

Likewise food is substituted as a disciplinary measure. Rather than a regular tray, as punishment, for offense not yet brought to Discipline Committee. Staff will give Bologna sandwiches, 3 meals a day, as long as they feel like it, in the instant case for "DAMAGING" property less than 1 dollar.

This is not BOP Policies, individual malice

II Background

Plaintiff is in Communication Management Unit (CMU),
As an incentive to "fall in line" the warden (TRUE)

has implemented a 24 hour lights on policy (100 WATT BULBS ON CELL ON CONSTANTLY IN 76"X90" CELL) Should one cover light to end the sleep deprivation, you are disciplined by moving to the "Hannibal Lecter" cell, and meds tossed out. (as happened 12/6/18)

Bearing in mind that facility was "SUPERMAX", TRUE made his personal, NON-BOP modification to cell 10. Even though there is no A.C. at Marion, TRUE removed fans from entire SHU, TRUE then used non BOP material - 1/4" plexiglas - in non BOP construction to stop all airflow to cell 10. Temps likely exceed 120° in summer, little heat in winter.

Mabe removed plexiglas with officer help, TRUE / MEDICAL responded by again depriving Mabe of meds 12/12/18, through 12/18/18, though they know danger occurs at 24 hours, this repetition shows a practise, not isolated event.

This is beyond indifference, this is cruelty, likely criminal.

III Immediate Relief.

Of course no one can oppose immediate replacement of prescription medication, where deprivation causes permanent FN2 disability, (TRUE MIGHT)

But the Court must go further and order TRUE to cease using food and medication as punishment, or sanction.

The BOP, of course does not allow such sanction, but BOP administrative appeal takes a year or more.

Immediate action needed to halt vision loss.

All statements herein are true under penalty of perjury

William Mabe

Copy hand delivered to defendant 12/15/18

William Mabe

Petition to proceed In Forma Pauperis.

Petitioner is without funds, as Court knows from 3:18cv01276 SCW.

Proving indigency can be done, but the delay will certainly cause more visual impairment - The Order must be NOW.

I swear I am, and have been indigent

William Mabe

FN1 - Likely employees of United States Public Health Service

FN2 LOSS OF 20° of peripheral vision since 12/12/18
THIS IS SERIOUS AND URGENT

PARTIES

PETITIONER

William Mabie 35831-044
U.S. PENITENTIARY
P.O. BOX 1000
MARION IL 62959

RESPONDENTS:

Dr. Bagg,
+

Health Services Director,

all at U.S. PENITENTIARY
P.O. BOX 1000
MARION IL 62959

UNITED STATES PUBLIC HEALTH
UNKNOWN MEDICAL WORKERS:

FE. PHYSICIANS ASSISTANTS

FULL TIME PHARMACIST

PART TIME PHARMACISTS

LT. BROOKS

LT. BLAIR

C.O. WISE

Counselor Burgess

* At time of mailing, all above were apprised of development of permanent vision loss due to withholding medication (BRIMONIDINE TARTRATE) and were indifferent or openly wanting more infliction of loss.

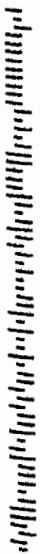
THIS IS A MEDICAL EMERGENCY

I am begging Court to engage, even if this petition contains any filing deficiencies.

W. HABIT 35831-044
U.S. PENITENTIARY
PO BOX 1000
MARION IL 62959

United States District Court
750 Missouri Avenue
East St Louis IL 62201

62201-295499



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